

COMMITTEE TO ELECT McHUGH
P.O. Box 6161 Watertown, N.Y. 13601

April 14, 1999

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Michael H. Young, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Identification Number: C00272153
Reference: Year End Report (11/24/98-12/31/98)

Dear Mr. Young:

This letter is in response to your letter dated April 6, 1999 and received by the Committee to Elect McHugh on April 11, 1999.

Our financial consultants, Huckaby-Davis and Associates, have reviewed the regulation you cited at 11CFR Section 104.9, which states that "Political committees shall report the full name and mailing address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made...together with the date, amount and purpose of such expenditure." You state that this regulation specifically refers to reporting the original vendors from credit card purchases. We were unable to find any reference to reporting the ultimate vendor on credit cards anywhere in the regulations.

However, in the spirit of full disclosure, the Committee does voluntarily itemize all original vendors from credit card purchases if the aggregate amount paid to these vendors exceeds \$200 in a calendar year. The Committee reports the name, city, state, amount of expenditures made, and the purpose of the payment for each of these vendors. In addition, the Committee keeps all billing records for credit card expenditures in accordance with 11CFR Section 102.9.

The Committee is in full compliance with 11CFR Section 104.9, and therefore, we believe no amendment to the Year End Report is required. If you have any questions, please feel free to contact Stan Huckaby or Lisa Lisker at 703-549-7705.

Sincerely,



Cary R. Brick
Treasurer

Paid for by Committee to Elect McHugh